

Gregory W. Gilliam
VENABLE LLP
Rockefeller Center
1270 Avenue of the Americas
25th Floor
New York, New York 10020
Tel: (212) 307-5500
Attorneys for Defendants Gemmy Industries Corp.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
CHRISHA CREATIONS, LTD.,

Plaintiff,

V.

GEMMY INDUSTRIES CORP.,

Defendant.
----- X

Case No. 08cv01185 (MGC)

**MOTION FOR *PRO HAC VICE*
ADMISSION OF MARTIN L. SAAD**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Gregory W. Gilliam, a member in good standing of the bar of this Court, hereby move for an order allowing the admission *pro hac vice* of:

Applicant's Name: Martin L. Saad
Firm Name: Venable LLP
Address: 575 7th Street, N.W.
City/State/Zip: Washington, DC 20004
Phone Number: 202-344-4345
Fax Number: 202-344-8300

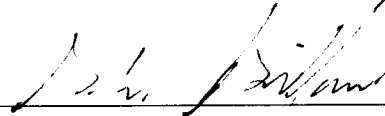
Mr. Saad seeks to appear as counsel on behalf of the defendant Gemmy Industries Corp. in this action and in all related matters.

Mr. Saad is and has been a member in good standing of the bars of the District of Columbia and Illinois and has no pending disciplinary proceedings against him in any state or federal court.

Dated: New York, New York
July 9, 2008

Respectfully submitted,

VENABLE LLP

By:  _____

Gregory W. Gilliam (GG2857)
Rockefeller Center
1270 Avenue of the Americas, 25th Floor
New York, New York 10020
Tele.: (212) 307-5500
Fax: (212) 307-5598

Counsel for Gemmy Industries Corp.

Gregory W. Gilliam
VENABLE LLP
Rockefeller Center
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Attorneys for Defendants Gemmy Industries Corp.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| ----- | X | |
| | : | Case No. 08cv01185 (MGC) |
| CHRISHA CREATIONS, LTD. | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| GEMMY INDUSTRIES CORP. | : | |
| | : | |
| Defendant. | : | |
| ----- | X | |

**DECLARATION OF GREGORY W. GILLIAM IN SUPPORT OF MOTION
TO ADMIT MARTIN L. SAAD TO PRACTICE *PRO HAC VICE***

Pursuant to 28 U.S.C. § 1746, Gregory W. Gilliam, declares as follows:

1. I am an attorney admitted to practice before this Court and am an associate at Venable LLP, counsel for Gemmy Industries Corp. ("Gemmy"). I am familiar with the proceedings of this case. I make this declaration in support of defendant's motion to admit Martin L. Saad *pro hac vice* as counsel to represent Gemmy in this action and in all related matters.

2. I am a member of good standing of the bar of the State of New York. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Saad is a partner in the Washington, D.C. office of Venable LLP, 575 7th Street, N.W., Washington, D.C. 20004. Upon information and belief, Mr.

Saad is and has been a member in good standing of the bar of the of the District of Columbia and has no pending disciplinary proceedings against him in any state or federal court.

4. Mr. Saad has read and is familiar with (a) the provisions of the Judicial Code (Title 28 U.S.C.), which pertains to the jurisdiction of, and practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Evidence; (d) the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York; (e) the New York State Lawyer's Code of Professional Responsibility as adopted from time to time by the Appellate Divisions of the State of New York; and (f) the code of Professional Responsibility of the American Bar Association.

5. If admitted to practice before this Court, Mr. Saad will faithfully adhere to all rules applicable to his conduct in connection with his activities representing defendant in this matter.

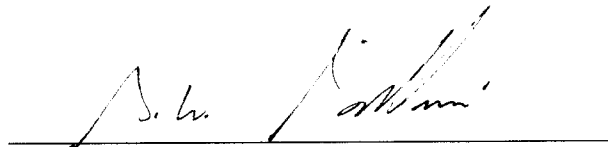
6. Mr. Saad agrees to pay the fee of \$25.00 upon filing of this motion to practice *pro hac vice* in this action. Mr. Saad's telephone number is (202) 344-4345.

7. Mr. Saad's Certificates of Good Standing from the Clerk of the District of Columbia Court of Appeals and the Clerk of the Supreme Court of Illinois are attached hereto as Exhibit A.

8. I respectfully submit a proposed order granting the admission *pro hac vice* of Martin L. Saad as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
July 9, 2008



Gregory W. Gilliam (GG2857)



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

MARIN L. SAAD

was on the 1ST day of FEBRUARY, 1999
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on June
16, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles
Deputy Clerk

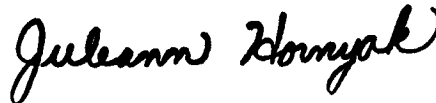
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Martin L. Saad

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on May 8, 2003 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Wednesday, June 18, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| | : | |
| Plaintiff, | : | |
| | : | |
| V. | : | |
| | : | |
| GEMMY INDUSTRIES CORP., | : | |
| | : | |
| Defendant. | : | |
| ----- | X | |

**ORDER GRANTING MOTION FOR
PRO HAC VICE ADMISSION OF MARTIN L. SAAD**

This matter having come before the Court on the motion for an order permitting Martin L. Saad, a partner at Venable LLP, to practice *pro hac vice* before the United States District Court for the Southern District of New York (the "Motion") to represent Gemmy Industries Corp. in this action and in all related matters:

IT IS HEREBY ORDERED that the Motion is hereby granted, and Martin L. Saad is hereby admitted *pro hac vice* before this Court to represent Gemmy Industries Corp. in this action and in all related matters.

Dated: New York, New York
July ____, 2008

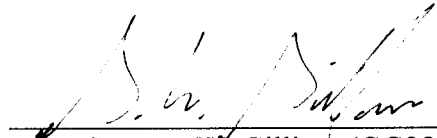
MIRIAM G. CEDERBAUM, U.S.D.J.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 9, 2008 I caused the foregoing Motion for the *Pro Hac Vice* Admission of Martin L. Saad and the accompanying declaration to be sent by first-class mail to the following:

Celeste M. Butera
Stephen J. Smirti, Jr.
Pia E. Riverso
Rivkin Radler LLP
926 RexCorp Plaza
West Tower – 10th Floor
Uniondale, New York 11556

Bartholomew Verdirame
Tony V. Pezzano
Michael P. Dougherty
Cadwalader, Wickersham & Taft LLP
One World Financial Center
New York, New York 10281



Gregory W. Gilliam (GG2857)